

Guidelines for Calculating Emissions from Cooling Towers

November 2017

Introduction:

Beginning 2006, facilities are required to report the particulate matter (PM), volatile organic compounds (VOCs), and toxics air contaminant (TAC) emissions from their cooling towers. The PM emissions are the result of the total dissolved solids in the circulating water which are carried out with the water that is entrained in the air being discharged from the tower. VOC emissions typically result from the leakage from process heat exchangers that service hydrocarbon (HC) process streams as well as from chemical treatment with VOC containing material added to the circulating water. VOC emissions are expected from cooling towers used in refineries and chemical plants, where the circulating water is used to cool down the process stream. VOC emissions are not expected from cooling towers used in Heating, Ventilating, and Air Conditioning (HVAC) and other industries such as power plant facilities, high rise buildings, hotels, hospitals, etc). TACs emissions are typically from the toxic constituents of PM and/or VOC in the circulating water.

Emission Calculations Procedures:

1. Facilities may use the default emission factors listed below to estimate the PM and VOC emissions using the equation below:

$$\mathbf{E} = \mathbf{Q} \times \mathbf{EF} \tag{Eq. 1}$$

Where:

E = Annual Emissions in pounds per year (lb/yr)

Q =Cooling tower circulating water in **million gallons or equipment rating (ton)** per year

EF = Emission factor expressed in lb/throughput unit

Default Emission Factors for Cooling Towers:

Type of Industry	Annual Throughput Unit	VOC EF	PM EF
Refineries	Million gallon / Year	0.7	19
Chemical mfg Plant	Million gallon / Year	0.7	19
Others	Million gallon / Year	_	19
HVAC	Ton / Year	_	1.643

References:

VOC: AP-42, Section 5.1, Table 5.1-2 PM: AP-42, Section 13.4, Table 13.4-1 HVAC: Operating 8,760 hours/year; at 3 GPM circulating water rate; with 2500 ppm solid in water; and drift loss of 0.005%. Cooling capacity (1 ton = 12,000 Btu/hr)

2. Alternative PM Emission Factor Calculation Method: Alternatively, facilities may use this equation to calculate PM emissions using site specific parameters:

$$EF = TDS \times \frac{\eta_{Drift}}{100} \times \rho_{H_2O}$$
 (Eq. 2)

Where:

EF = emission factor, lb/mmgal

TDS = Concentration of total dissolved solids in circulating water (PPM by weight)

 η_{Drift} = Drift loss of circulating water (%)

 $\rho_{H,O}$ = Density of Water (lb/mmgal)

3. Toxic Air Contaminants: Facility may also use this equation using Eq 1 to calculate TACs emissions (if applicable). TAC emission factor calculation is shown below:

$$\mathbf{EF_{TAC}} = \mathbf{EF_{VOC \text{ or } PM} \times W}$$
 (Eq. 3)

Where:

 EF_{TAC} = Toxics air contaminants emission factor (lb/mmgal)

 $EF_{VOC \text{ or }PM} = VOC \text{ or } PM \text{ emission factor used to report cooling towers emissions}$

(lb/mmgal)

W = Weight fraction of TAC in VOC or PM (decimal format)

EXAMPLE ON HOW TO REPORT THE EMISSIONS:

A chemical plant operates a mechanical draft cooling tower circulating 3,650 million gallons for the year of water to cool down process stream. Source test indicated 0.2% Nickel present in the PM emissions from the cooling tower.

Facilities are required to report their VOC, PM, and TAC emissions from the cooling tower using the new AER web program.

Image 1:

Since the cooling tower is not a permitted source, it must be added to the list by clicking <u>Add New Emission Source</u> (in blue font).

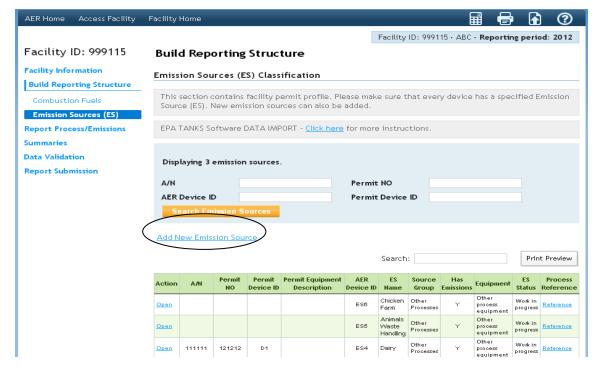


Image 2:

Fill out relevant information to the added Emission Source by identifying ES Name (example, Cooling Tower) and selecting the Operating ES Status (i.e., Normal Operation) from drop-down menu.

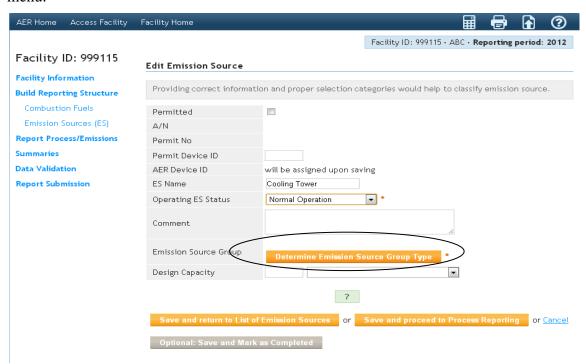


Image 3:

After clicking Determine Emission Source Group Type, this image will pop-out. Select No. 7 and click "click here (blue font)" to mark Other Process Equipment. Click the box designated as Other process equipment, and click Save button.

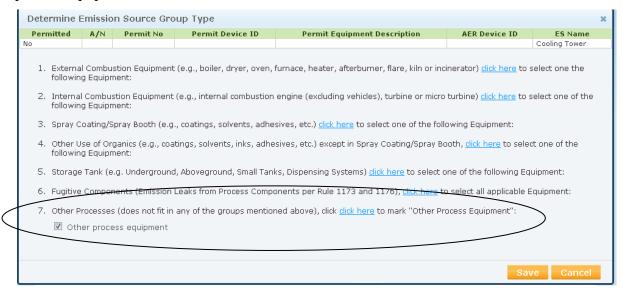


Image 4:

After saving, the program reverts to Image 2 (below). Click Save and proceed to Process Reporting button to start reporting emissions for the added Process.

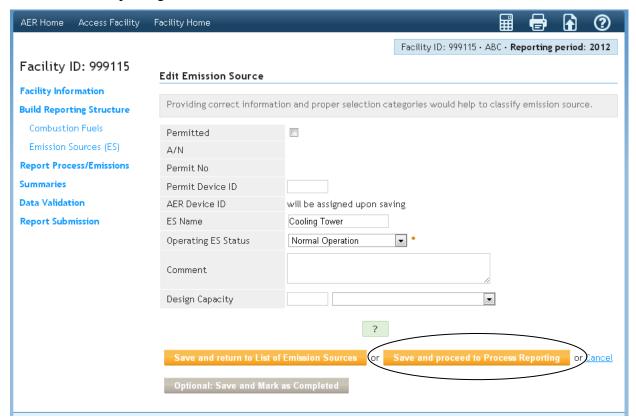


Image 5:

This image will pop-out after clicking **Save and proceed to Process Reporting** button. The new Process added is shown as P1 (process 1). Click the box indicating P1 to begin entering information, such as, process throughputs, criteria emissions and emission factors, and TACs.

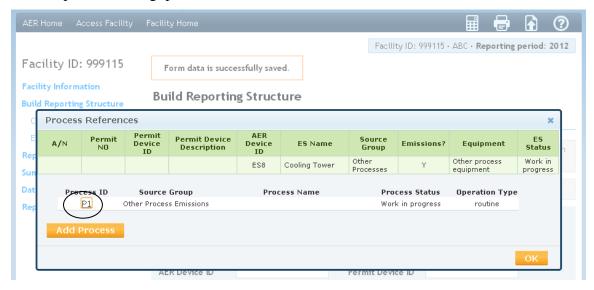


Image 6:

There are 4 main information needed for reporting air emissions for the process, namely, Process, Throughput, Criteria Emissions, and Toxic (TAC/ODC) Emissions.

A. Process: -Open the Process section (by clicking the blue font **Open**) to identify the Name, Activity Code, and select the appropriate Sector, Industry, Operation, Process, and applicable Rule by clicking the Drop-down arrow at the corner of each box.

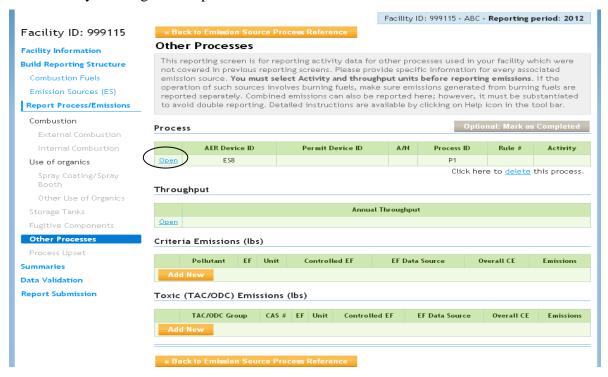


Image 7:

After clicking **Open**, this image will pop-out. Identify the Process Name for the process P1 and fill out the Activity Code by selecting the appropriate information from the drop-down menu from each box. Example shows correct sector, industry, operation, process, and rule for the Cooling Tower. Click Save button.

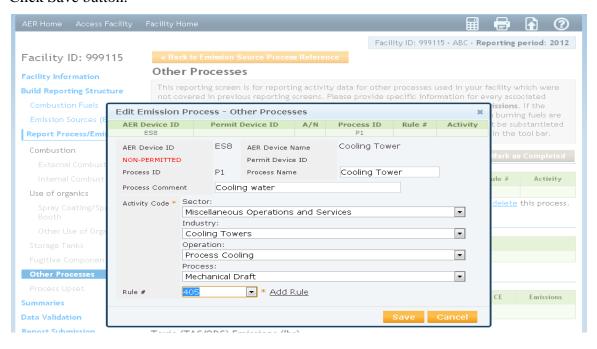


Image 8:

B. Throughput - After saving, the program returns to this image (below). This time, open the **Throughput** section to enter the Annual Throughput, Type, Comment, for the Process, as shown below.

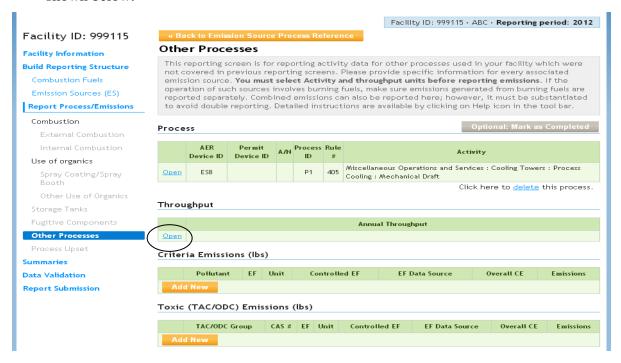


Image 9:

After clicking **Open**, this image will pop-out. Enter the Annual Throughput and its unit measure, Type, Comment, as shown for example Process, below. Click Save button.

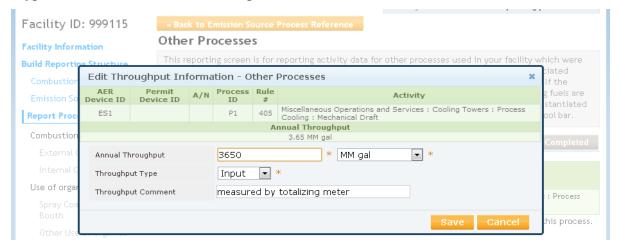


Image 10:

C. Criteria Emissions - After saving, the program returns to Image 6. To add the Criteria Emissions involved in the Process, click "Add New" (yellow button)"under Criteria Emissions section. This action will show the image below, to select the type of emissions (VOC in this example), emission factor (from Table) and its reference. It also calculates the specific air emissions for the process. Click Save button.

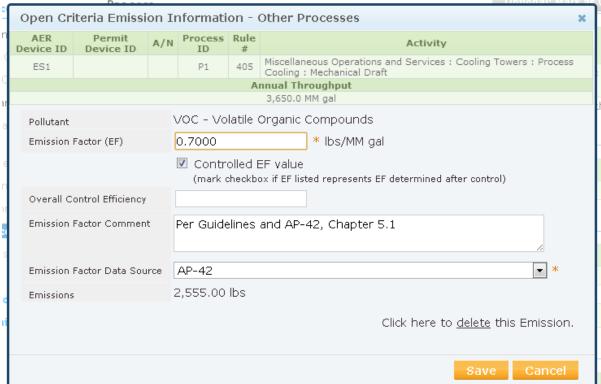


Image 11:

After saving VOC information, the program reverts to Image 6. To add the next pollutant, like PM, for the same Process P1, click the **Add New** button under **Criteria Emissions** section again. Select the type of pollutant, (PM) from drop-down menu, enter the applicable emission factor (from Table), emission factor comment and its source and enter them at appropriate boxes. Click Save button.



Image 12:

D. Toxic (TAC/ODC) Emissions - After saving the criteria emissions, the program reverts to Image 6 (as shown below). To add TAC/ODC emissions from the same Process P1, (Nickel, in this example), click the **Add New** under **Toxic** (**TAC/ODC**) **Emissions** section.

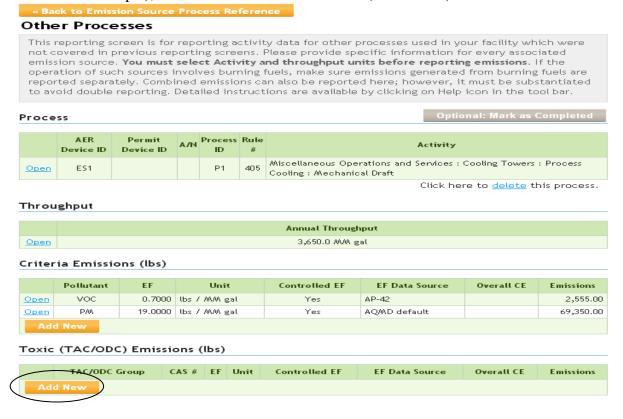
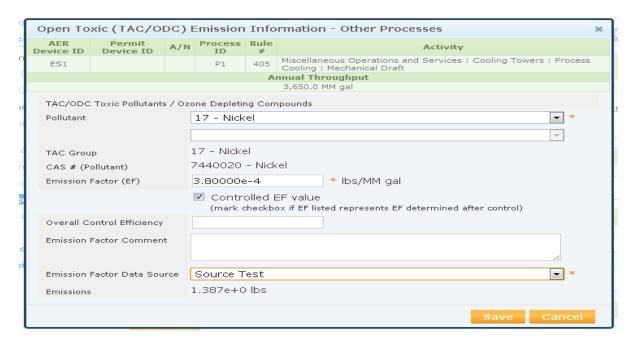


Image 13:

Select the pollutant, Nickel, from drop-down menu and enter applicable Emission Factor, Control Efficiency, and enter them at appropriate boxes. Click Save button.

Note: $EF_{Nickel} = 0.2\% \times 0.19 \text{ lb/mmgal} = 0.00038 \text{ lb/mmgal}$



After clicking Save button, the program reverts to Image 6. If there is additional TAC/ODC from the same process, repeat the steps shown in Images 12 and 13. When all air emissions have been reported, the program will revert to Image 6. Follow all remaining steps in completing the report.